

**GOVERNMENT OF THE VIRGIN ISLANDS
OF THE UNITED STATES**

PUBLIC SERVICES COMMISSION

IN THE MATTER OF THE VIRGIN
ISLANDS WATER AND POWER
AUTHORITY PETITION FOR
ELECTRIC SYSTEM RATE RELIEF

PSC DOCKET NO. 678

REPORT AND RECOMMENDATIONS

This is a highly unusual base rate case inasmuch as the Virgin Islands Water and Power Authority (“the Authority”) has amended its request for base rate relief three times with the most recent change made just days before the Public Services Commission is scheduled to consider the Authority’s request and weeks after this Hearing Examiner has concluded the evidentiary and public hearings in this matter. Added to the confusion is the base rate calculation method employed by the Authority throughout this proceeding, which method is best described as a moving target as it is difficult to pinpoint the accounting or mathematical justification for the various revisions to the relief requested by the Authority. The atypical nature of this base rate case is further complicated by the almost palpable animosity between the Authority and the Commission’s staff, which animosity is evident in the exchanges between the parties during the hearings, their filings, and has been laid bare to the public through various public appearances and press releases.

It is under this cloud of what is best described as a ratemaking quagmire that



the Hearing Examiner issues the following report and recommendations to the Commission.

BACKGROUND

Original Base Rate Petition

On or about May 17, 2019, the Authority submitted its original and initial base rate petition seeking a \$55.1 million increase in base rates. The Authority explained the proposed increase in base rates was needed because “[t]he failure of the Authority’s base revenues to keep pace with operating and capital costs have created a revenue deficiency which continues to threaten the operational and financial integrity and sustainability of WAPA’s Electric System.” Pet. for Elec. Sys. Relief, at ¶ 12. The Authority explained that its operational costs increased due to the following circumstances:

1. substantial declines in its customer base which translates to a decline in its overall sales from approximately 641,000 MWh during the last base rate case in 2017 to 523,000 MWh annually;
2. an additional 18% decline in sales due to the devastation caused by Hurricanes Irma and Maria, which is equal to approximately \$21.5 million in annual base rate revenue);
3. increases in generating lease payments to fund Units 25, 26, and 27 in St. Thomas and the Aggreko Unit in St. Croix;
4. debt service requirements equal to 125% of the aggregate principal and interest on the Authority’s senior lien bonds;

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5. the need for adequate levels of working cash reserves; and
6. the need to maintain adequate levels of routine capital additions.

Using FY2020 as the Test Year for its calculations, the Authority projected that its base rates were insufficient by \$43.2 million to fund its operating expenses and debt service payments and in excess of \$55.1 million when considering its near-term capital improvement needs associated with capital maintenance on the plant and transmission facilities along with a fire suppression system. In support of the base rate petition, the Authority, through its Executive Director and Chief Executive Officer, Lawrence J. Kupfer, testified that the projected insufficiency in current base revenues were due primarily to unrecovered leased generator costs and the decline in electric sales. The Authority further proposed a “true-up” mechanism, which would provide for an annual review of actual sales volume compared to the test year sales forecast and allow for an adjustment in the subsequent year if the actual sales are higher or lower than forecasted.

The Authority’s proposal, if approved, would have resulted in a 54.7% base rate increase and a resulting debt service coverage of 119%. Coupled with other income derived from the Authority’s proposal to reinstate the OPEB surcharge at a rate of \$0.002166 per kWh and implementing a proposed security and street lighting rate of \$24.59 per month, the proposed 54.7% base rate increase would fund the estimated operating expenses and debt service requirements and provide approximately \$13.8 million in essential capital improvements. The Authority’s original proposal is summarized in the table below:

DESCRIPTION	FY2020 (in millions)
Gross Revenues at Existing Rates	\$219.5
Operating & Maintenance Expenses	-\$199
Net Revenues	\$20.5
Senior & Subordinate Debt Service	-\$30.9
General Fund Debt Service	-\$32.8
Sub-total Existing Deficiency	-\$43.2
Amount Due from Water System	\$1.9
Capital Funded from Rates	-\$13.8
Total Projected Deficiency	\$55.1
Resulting Percentage Increase in Base Rate Revenues	54.7%

The actual impact to consumers as a result of the proposed base rate increase, reinstatement of the OPEB surcharge, and implementation of a security and lighting surcharge would have resulted in a 24.4% or \$38.45 increase to the monthly bill of the average residential customer.

The Authority requested expedited consideration of its petition with an implementation date of July 1, 2019 for the proposed base rate increase.

Appointment of Hearing Examiner

On or about July 9, 2019, the Commission's Executive Director retained the

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undersigned to serve as the hearing examiner for this base rate case. On July 31, 2019, the Commission ratified the appointment of the Hearing Examiner for this base rate case only and requested the Hearing Examiner consider Rate Defection, ie. a corresponding decrease in customers and sales when rates are increased, as part of her analysis of the base rate petition. The Hearing Examiner was not appointed to consider any matters in Docket 289 concerning the LEAC.

Upon ratification of the appointment, the Hearing Examiner issued a scheduling order providing for evidentiary and public hearings to be held in September, 2019 with post-hearing submissions and a final report and recommendations to be issued on or about October 21, 2019. Upon the request of the Commission's staff, which was supported by the Authority, the hearings were rescheduled to October.

Amended Base Rate Petition-Anticipated "Nominal" Impact to Ratepayers

On August 5, 2019, the Authority updated and supplemented its petition for base rate relief seeking an emergency rate increase to pay outstanding amounts owed to its propane supplier, VITOL. The Authority explained that the failure to make payment to VITOL would cause the Authority to resort to the exclusive use of fuel oil, which is 44% more expensive than the cost of propane. The exclusive reliance on fuel oil was estimated to result in an increase of \$24.00 to the monthly bill of the average residential customer, according to the Authority.

Although premised on the need to make immediate payment to VITOL, the supplemental base rate petition revised drastically the Authority's request for base rate relief. Instead of seeking \$55.1 million in additional revenue through increased

base rates, the Authority sought approval of a \$30.4 million increase instead.

As explained by the Authority's rate consultant, the Authority identified "certain key adjustments" to its financial projections, which allowed for it to lower its request for a base rate increase. These adjustments are:

1. removal of near-term capital improvements of \$13.8 million from the electric base rates;
2. anticipated removal of the leased generator surcharge once, and if, the proposed base rates are approved;
3. the refinancing of certain bonds resulting in a \$2 million reduction; and
4. an estimated delay in the repayment of the Streetlight Bond Anticipation Note (BAN) and Electric Community Disaster Loan (CDL) resulting in a \$4.7 million reduction.

These adjustments resulted in an \$8.9 million decrease in operating expenses. In addition to these adjustments, which resulted in a reduction of the proposed base rate increase, the Authority also adjusted its proposal to allow for a \$4.8 million increase in VITOL payments. The Authority explained, "[a]s part of the settlement arrangement with VITOL, VITOL has requested an additional monthly payment of \$1.5 million to cover past due infrastructure payments in addition to the current monthly infrastructure charge of \$2.6 million. The \$400,000 monthly payment included in base rates will cover approximately 27% of the additional amount."

Testimony of Henry Thomas, at 6:11-18.

Further, the Authority, in an effort to reduce the impact of increased base

rates to consumers, further proposed an immediate decrease in the LEAC of 2.5 C/kWH to correspond with the proposed increase in the base rates of 2.5 C/kWH. Without a corresponding reduction in the LEAC, the proposed base rate increase would result in a \$20.90 increase to the monthly bill of the average residential customer at an increased rate of \$5.2 cents per kWh. With the corresponding and proposed reduction in the LEAC, the increase in bills to consumers was described by the Authority as *nominal*. Testimony of Kupfer dated October 22, 2019, at 44:2-7; *see also*, Post-hearing Brief of WAPA, at ¶ 9.

In his testimony in support of the Supplemental Petition, Mr. Kupfer testified that “Customer Bills Will Not Be Going Up”. However, the more detailed testimony of the Authority’s rate consultant during the evidentiary hearing reveals an increase of more than \$8.00 per month to the bill of an average residential customer. Specifically, Mr. Thomas testified:

So today, based upon the rates and surcharges in place, the projected monthly bill – and I am going to start with the one at 400 kilowatt hours, because that represents the roughly average bill that we see out there. The current bill would be \$170.08 for that 400 kilowatt hours. That’s based on a customer charge of \$4.80, an energy charge of 15.0141 cents; above 250 that’s 17.6339 cents. And, again, the proposed rate increase it would move that bill to \$178.64. That’s an \$8.50 increase, roughly 2.14 cents for 5 percent increase in the residential bill. And that base rate does roll in the generation leased surcharge into base rates there, so there is no longer a generation surcharge.

Testimony of Thomas dated October 23, 2019 at 120:1-3. Mr. Thomas’ calculation, ostensibly, does not include the proposed corresponding decrease in the LEAC. As explained during Mr. Kupfer at the same evidentiary hearing:

So, the LEAC petition we have before the PSC, I think, calls for a 2.5-cent

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per kilowatt hour reduction. And so the base rate increase we're saying averages 6. It's actually 5.8. So it is not quite 6. So the net effect of the lower LEAC and putting in the 5.8-cents but taking out the 3.1 basically leaves the status quo of where we are in terms of overall rates as they exist to customers today.

Testimony of Kupfer dated October 22, 2019 at 78-79:21-4. After parsing the testimony and figures presented by the Authority, the Hearing Examiner gleans that the proposed impact to consumer bills under the Supplemental Petition was \$0.15 per kWh resulting from the proposed 5.8 cents per kWh increase and the proposed corresponding decrease of 2.57 cents per kWh in the LEAC and the additional offset of the leased generator surcharge at 3.08 cents per kWh.

Second Amended Request for Relief-Zero Impact to Ratepayers

During the week of the scheduled submission of the Hearing Examiner's Report and Recommendation, the Authority issued a public notice to its consumers stating that its proposed base rate increase with the corresponding proposed reduction in the LEAC would have zero impact on consumer bills. This announcement deviated considerably from the actual status of the base rate petition, which projected a \$0.15 per kWh increase to the overall consumer bills and from the prior statements by the Authority that the impact to consumer bills would be nominal. Adding to the confusion created by the Authority's public announcement on the eve of the submission of the Hearing Examiner's report was the Authority's submission of a letter to the Commission describing the actual current status of its request for a base rate increase as a "misconception" along with an attachment that altered the calculation of the proposed base rate increase

currently before the Commission for consideration.

In response to the Hearing Examiner's request for clarification of the conflicting information, the Authority presented the testimony of its rate consultant, which testimony further revised the supplemental petition for base rate relief. In that testimony, Mr. Thomas explained that the proposed base rate increase was further adjusted in conjunction with the currently proposed LEAC to result in zero impact to consumer's bill. Specifically, the Authority further reduced its proposed base rate increase by \$662,009.00. In other words, the Authority did not revise its request due to a change in operating expenses or even a change in projections. Rather, it further revised its request in an attempt to eliminate any impact whatsoever to the monthly bills of its consumers.

The Investor Interest

In an August 2, 2018 Opinion, Moody's Investor's Service assigned the Authority a negative rating outlook. Moody's opined that the Authority's liquidity profile "remains constrained by limited amounts of cash on hand, fully drawn working capital credit lines, high outstanding government receivables, certain overdue supplier trade payables and upcoming debt maturity of \$34 million in November 2018." Regarding the Authority's challenges, Moody's cited:

- customer peak demand and revenue collections remain well below pre-hurricane levels
- very limited liquidity resources and upcoming November 2018 debt maturity
- unchanged high amount of outstanding government receivables

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- execution of various capital projects will require management resources and good control of costs
- high retail electricity rates
- untimely release of 2017 audit

Moody's also credited the Authority with certain strengths to include power restoration to eligible customers, FEMA grants for funding of capital improvement projects, and more transparency by new management, among other highlights.

However, of particular relevance to this proceeding and to the Hearing Examiner's analysis, are factors identified by Moody's that could lead to an upgrade, including "rate increases supporting improved cost recovery and translating into improvement of financial metrics with Moody's total fixed charge coverage ratio improving to 1.0x".

Similarly, in September 2019, Fitch Ratings, Inc. placed the Authority on a negative rating watch. Citing concerns related to statements by public officials, Fitch explained:

[t]he rating action further reflects prevailing concerns related to (i) the adequacy of ongoing cash flow and liquidity, particularly given the Virgin Islands Public Services Commission's **continuing reluctance** to approve requested rate increases, (ii) the utility's ability to procure adequate fuel supply, and (iii) the lingering effect of the 2017 hurricanes on the demand for electricity and the regional economy, in general.

(emphasis added)

Consumer Interest

In an effort to conduct the balancing test required when considering a request

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for base rate increase, the Hearing Examiner conducted public hearings on the islands of St. Croix, St. Thomas, and St. John and further provided the public the opportunity to present written testimony. 30 V.I.C. § 23(b)(. . . so as to be fair to the consumer interest, and to be fair to the investor interest . . . “). Ratepayers, particularly in the St. Thomas/St. John District, availed themselves of the opportunity to express their opinion regarding the proposed base rate increase. The overall sentiment of the ratepayers demonstrated an inability to sustain any further increases to their monthly bills and a desire for lower rates and improved service. Ratepayers complained of frequent blackouts, billing problems, and damage to household appliances and the loss of perishable goods. Ratepayers on fixed incomes testified as to having to choose between buying groceries and medication or paying their electric bills, while small business owners shared concerns regarding their ability to continue operating their businesses due to the ever-increasing cost of electricity. The views expressed by ratepayers was compelling and makes clear that large segments of the Territory’s community simply cannot survive or withstand additional increases to their monthly electric bill.

The Hearing Examiner also considered the written statement of the representative of the Territory’s largest ratepayer -the Virgin Islands Government. In his capacity as the Territory’s leader, the Governor of the Virgin Islands acknowledged the Government’s contribution to the impaired financial status of the Authority in the form of longstanding and enormous receivables owed to the Authority by the Government, his recent payment of those receivables, and his

commitment to the Authority's efforts to provide reliable and affordable power. The Governor cited a desire to "avoid any rate increases", but also expressed that an increase in base rates was needed to secure the revenue needed refinance the Authority's debt.

On October 26, 2019, the Authority requested the Hearing Examiner treat the Governor's statement as an exhibit and afford it greater weight than the statements submitted by other ratepayers. The Hearing Examiner declined to give the Governor's statement special treatment and advised the parties that the Governor's statement would be considered in the same manner as all the other statements submitted by the public in consideration of the instant base rate case. *See*, Email exchange between Hearing Examiner, the Authority, and the Commission Staff dated October 26, 2019.

LEGAL STANDARD

The Legislature of the Virgin Islands statutorily authorized the Commission to set the rates the Authority charges to its customers and further required the Commission to ensure that the rates charged are just and reasonable. 30 V.I.C. § 23(a); *see generally*, *St. Joseph Stockyards Co. v. United States*, 298 U.S. 38, 50 (1936)(stating, "[e]xercising its rate-making authority, the Legislature has broad discretion. It may exercise that authority directly, or through the agency it creates or appoints to act for that purpose in accordance with appropriate standards.") The Virgin Islands Legislature, however, has not provided a specific formula by which a "just and reasonable" rate is to be determined. *See*, 30 V.I.C. § 1, *et. seq.* Instead, it

has provided guidance to the Commission by charging it with balancing the interests of consumers against the interests of the Authority in securing an appropriate return for its investors. 30 V.I.C. § 23(b). In accordance with section 23(b), the Commission is responsible for:

provide[ing] a return of not less than six (6) nor more than eight (8) percent on the net investment in the property *prudently* acquired for and devoted to the public use, unless the Commission makes a special finding that a different return is imperative, so as *to be fair to the consumer interest*, and *to be fair to the investor interest* by providing a return commensurate with returns in other enterprises having corresponding risks, and which will assure confidence in the financial integrity of the enterprise, so as to maintain its credit and to attract capital.

30 V.I.C. § 23(b) (emphasis added). Therefore, the Commission must first determine whether certain investments made by the Authority were, in fact, prudent. After concluding its prudence analysis, the Commission must then balance the competing consumer and investor interests to then determine whether a return of 6%-8% is sufficient. In performing its analysis, the Commission shall interpret the language of section 23 liberally to accomplish the purposes of ensuring the provision of safe and adequate service while also protecting the consumer from rates that are unreasonable, unjust, and discriminatory. 30 V.I.C. §§ 2 and 41.

Despite the lack of a specific rate setting formula, there are several well-established principles to guide the Commission's exercise of its rate-making authority. *See generally*, 73B C.J.S. Public Utilities § 122 (2013). These principles require the Commission to give effect to all statutory requirements and to consider all elements pertinent to the rate case. *Id.* The Commission should determine what

is just and reasonable on the basis of the record before it and limit its inquiry to matters raised by the public utility and related to the rates which are the subject of the application. *Id.* The Authority has the burden of proof to demonstrate that the proposed rates are just and reasonable. *Casco Bay Lines v. Public Utilities Commission*, 390 A.2d 483 (Me. 1978).

In setting rates, the Commission is not bound by any particular formula or method as the rate-making function “is not a matter of exact science or capable of precise mathematical calculation.” *Id.* Rather, the Commission should look to “broad equitable principles” focused more on the impact of the rate and less on principles of theory. *Id.*; *see also, Federal Power Commission v. Hope Natural Gas*, 320 U.S. 591, 602 (1944)(stating “[u]nder the statutory standard of ‘just and reasonable’ it is the result reached not the method employed which is controlling.”). Therefore, while the Commission should give due consideration to the Authority’s accounting methods, those methods do not dictate the Commission’s rate-making policy. 73B C.J.S. Public Utilities § 122. The Commission’s function, rather, involves the making of “pragmatic adjustments” as necessitated by the particular rate case. *Id.*; *see also, Hope Natural Gas*, at 602.

The Hearing Examiner has applied the legal standard to the instant base rate case and issues the following report and recommendations to the Commission.

ANALYSIS

While the Hearing Examiner commends the Authority’s effort to eliminate any increase to the overall rates charged to consumers, the inconsistency in the

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methodologies employed by the Authority to arrive at its proposed rates makes it difficult, nearly impossible for the Hearing Examiner to conduct an appropriate investigation. That the Authority further revised its proposed base rate increase *after* evidentiary hearings were conducted further complicates the work of both the Hearing Examiner and the Commission to determine whether rates are just and reasonable and deprived the public of the opportunity to express its opinion regarding a base rate increase that would result in zero impact to consumer bills.

However, and in light of the emergency nature of the requested base rate increase and the overwhelming testimony of ratepayers against any increase to their monthly bills, the Hearing Examiner concludes that she has sufficient information to issue a report and recommendations regarding the Authority's most recently revised proposal.

The Authority seeks the instant base rate increase to obtain investor confidence and to negotiate the refinancing of certain debt, primarily the debt associated with the VITOL contract. Both parties agree that propane is more affordable than fuel oil, but disagree as to whether the investment in VITOL was prudent such that increasing the base rate, in part, to fund payments to VITOL is just and prudent. Specifically, the Commission staff maintains that poor management and decision making resulted in contract overruns in excess of \$80 million, while the Authority argues that the increased contract costs were anticipated and therefore should be funded through base rates. In addition to the issues concerning VITOL, the testimony and post-hearing briefs of both parties

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make clear that the proposed base rate increase would not significantly contribute to the solvency of the Authority, such that the Authority may seek another base rate increase in the near future. Finally, tying the impact or lack thereof of the base rate increase to the LEAC is unsustainable as the LEAC fluctuates with the price of fuel and is unlikely to remain stagnant during the anticipated three-year life of a proposed base rate increase. An increase in the LEAC would result in an increase to the electrical bills of consumers, while a decrease in the LEAC would, of course, have the opposite impact to consumer bills.

VITOL Debt

The Hearing Examiner is not convinced that the negotiation of the VITOL contract was prudent as the ultimate costs associated with the contract nearly doubled the original price negotiated by the Authority and the Authority describes some of the increased cost as “unforeseen”. WAPA Post-hearing Brief, at ¶ 24. In addition, there is not sufficient information before the Hearing Examiner, such as the studies conducted pursuant to the contract, to conduct a proper prudency analysis nor has the Commission appointed the Hearing Examiner to conduct a prudency investigation. Fortunately, a prudency analysis of the contract is not required as the Authority does not seek to recover the total increased cost of the contract through this base rate case, but rather seeks to fund monthly settlement payments associated with past due infrastructure payments for a limited period while relying on increased base rate revenues to refinance the VITOL debt. The strategy proposed by the Authority is consistent with the opinion of the credit rating

agencies, which cite the Authority's overdue supplier trade payables, among the reasons for placing the Authority on a negative rating watch. Moreover, a refinancing of the debt associated with the VITOL contract would benefit ratepayers as the Authority would have continued access to the lower cost of propane to generate electricity.

LEAC

The Authority's LEAC petition is not before this Hearing Examiner for consideration although the proposed base rate increase is tied to a proposed corresponding decrease in the LEAC. *See e.g.*, Testimony of PSC Consultant dated October 23, 2019, at 166:7-1. For purposes of this report, the Hearing Examiner will address the concern about tying a base rate increase to a LEAC decrease and the resulting uncertainty to ratepayers in the event of an increase to the LEAC.


During the evidentiary hearing, rate consultants for both parties testified as to automatic rate adjustment clauses, which would allow for automatic rate adjustments based on specified triggers. In terms of the instant base rate case, both parties agree that an automatic downward rate adjustment could be triggered by a favorable refinancing of the VITOL contract. Similarly, an automatic rate adjustment of base rates tied to fluctuations in the LEAC could also be employed to avoid any increase to consumer bills based on a future increase to the LEAC. The use of an automatic rate adjustment in this manner would provide an incentive to the Authority to deliver on the promises of refinanced debt and reduction in generation costs that would result in corresponding decreases to both the base rate

and the LEAC, resulting in an overall decrease to the monthly bills of consumers.

RECOMMENDATION

For the reasons stated above, the Hearing Examiner recommends the Commission approve the Authority's most recently revised request for a base rate increase of \$29,733,687.00, which increase would be tied to a corresponding reduction in the LEAC and having a zero impact on the current overall rates charged to consumers. The recommended increase to the base rate allows for the reinstatement of the OPEB surcharge at \$0.002166 per kWh and the elimination of the line loss, maintenance, and leased generation surcharges. In addition to approving the request for the base rate increase, the Commission should order the automatic downward adjustment of base rate upon the submission of evidence by the Authority that it has successfully negotiated the debt associated with the VITOL contract and any other debt, which would result in a decrease to the Authority's operating expenses. Similarly, the Commission should also order the automatic downward adjustment of the base rate be triggered by any future increase to the LEAC such that ratepayers would not experience an increase in their overall bill in the event of a future increase to the LEAC.

DATED: December 11, 2019

BY: 
Kye Walker, Esq.
Hearing Examiner

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 11, 2019, I electronically and/or manually served the Commission staff's "**REPORT AND RECOMMENDATIONS**" IN PSC Docket No. 678 on the following:

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I further certify that a copy of the information and Certification have been entered into the record in this Docket.

